

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC, 20554

In the Matter of)
Creation of a Low)
Power Radio)
Service)

MB Docket No. 99-25

My name is Richard Van Zandt, I have been a full-time broadcast engineer for over 25 years, and I strongly support the Federal Communication Commissions effort to expand and support the Low Power FM radio service.

Low Power FM stations across the country are doing a fine job at providing local and alternative programming to their area. The greatest need I see in broadcasting is for more local and alternative programming. Therefore, it is vital that the FCC provide greater support and protection to the LPFM service.

The LPFM service is faced with serious threats, such as: full-power stations and FM translators that "move-in" and reduce their coverage, or worse yet they "move-in" and displace the LPFM. Since LPFM stations have very limited coverage (typically 4 miles) they cannot afford any loss of coverage. Further complicating matters are the many forces pushing IBOC and the high cost of conversion and yearly royalty fees. I believe that all NCE stations should be exempt from IBOC Royalty Fees.

The FCC should allow LPFM stations to operate with up to 1,000 watts ERP as the FCC originally proposed for the LPFM service. LPFM stations should be allowed to increase ERP using the standard Section 73.509 Interference Rules rather than being limited to the current mileage separation rules. FM Translators which usually provide no local programming can operate with 250 watts... LPFM stations which provide local programming should certainly be allowed to run the same power as FM Translators, if not more. FM Translators are allowed to use the less stringent 73.509 protection rules along with numerous waivers, such as the 74.1204 Interference Waiver... LPFM stations which provide local programming should receive at least the same or much better allowances.

Since LPFM stations provide much needed local programming they need and should receive Primary Status and not be required to protect FM Translators which broadcast distant programming.

Since many existing LPFM stations have already had their coverage reduced or even put off-the-air by full-power stations and FM Translators moving into their area... existing LPFM stations need to be allowed to move to any other available channel immediately as a "minor change". It is unreasonable for them to have to wait for the occasional (once every few years) filing window.

In my 25 years of broadcast engineering I have never seen a case of FM 3rd Adjacent Channel interference. Since there is a tremendous lack of frequencies available for LPFM, I strongly recommend that LPFM stations not have to provide 3rd Adjacent Channel protection to any other FM station or Translator. In fact, I'd like to see LPFM stations not have to protect the 2nd Adjacent Channel either as 2nd Channel interference is very uncommon. Also, after TV-6 has transitioned to digital, I recommend that the frequency range from 82 to 88 Mhz be reserved for LPFM and NCE radio stations.

The FCC began a very good work when authorizing the LPFM Service. Supporting and encouraging the LPFM service is strongly in the

public interest. The LPFM service greatly needs the FCC's support and protection in order for it to survive and advance.

Respectfully submitted,

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